

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE
FOR PERSONAL INJURY AND DEATH CLAIMS**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC	Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP
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VIA ECF and E-Mail

April 5, 2022

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs write to update the Court regarding the June 9, 2021 Request to the United Kingdom for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on Taking of Evidence Abroad in Civil or Commercial Matters ("Request") (ECF 6384-1, 6858), and respectfully request the Court's permission to lodge a complete set of certified copies of the United Kingdom materials with the Court via a thumb drive (containing files in a variety of formats, including video) without delay.

The Request sought to obtain copies of evidential holdings (historical) from the Metropolitan Police Service (MPS) at New Scotland Yard in London in connection with Saudi government employee Omar al-Bayoumi.

The procedures and timelines for execution of the Request were ordered and overseen by the Senior Master of the Royal Courts of Justice, in her capacity as United Kingdom Central Authority for Hague Convention Requests. The attached Declaration of James Gavin Simpson, Esq. describes the steps undertaken to execute the Request, provides full details of the MPS documents and other materials, and sets forth the basis for Plaintiffs' request that the materials be filed with the Court in electronic format. *See* Attachment 1 hereto ("Simpson Decl."). It also sets forth the chain-of-custody protection that the MPS Disclosure Team and Plaintiffs employed when transferring the materials. *See* Simpson Decl. at ¶¶ 8-11.

The Honorable Sarah Netburn

April 5, 2022

Page 2

Between March 23, 2022 and March 30, 2022, the MPS Disclosure Team responsible for processing the Request handed over responsive materials to Plaintiffs in digital format. *See* Simpson Decl. at ¶¶ 9-10. The MPS production includes certified copies of a total of 360 individual evidential items, including more than 14,000 pages of documents, more than 20 hours of video footage, and multiple hours of audio recordings. Simpson Decl. at ¶ 11. Its combined digital file size exceeds 30 GB. *Id.* None of the responsive materials are subject to any confidentiality protections or sealing orders. *Id.* at ¶¶ 6-7.

Given the large volume of files at issue and the inclusion of original audio and video files in the MPS materials, Plaintiffs seek leave to deposit with the Court a USB thumb drive on which the entire MPS production is saved in original digital formats. The materials were provided to counsel for the Kingdom of Saudi Arabia and Dallah Avco on Friday April 1, 2022, via Dropbox and copies can be made available in other formats upon request.

Respectfully Submitted,

KREINDLER & KREINDLER

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